

Charnwood Borough Council

Southfields

Loughborough

Leicestershire

LE11 2TT

C/O Mr Ian Kemp

Representation Number: 615

Representor: Mr C Green

Via Email Only: ikemp@icloud.com

12 January 2023

Dear Sir/ Madam,

CHARNWOOD LOCAL PLAN EXAMINATION FURTHER HEARING STATEMENTS

Introduction

We are submitting this representation to provide a response to the supplementary questions produced by the Inspector in relation the Charnwood Local Plan 2021-37 Examination.

This representation provides a review of the planning policy context and a response to the following matter:

Matter 2: Visions, Objectives and Sustainable Development and the Development Strategy

Planning Policy Context

The following section details the relevant planning policies which have informed this representation.

Paragraph 8 of the National Planning Policy Framework (NPPF) (2021), hereinafter referred to as the NPPF, sets out three sustainability objectives which are as follows:

“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

As detailed in paragraph 22, *'strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.'*

In accordance with paragraph 35 of NPPF (2021), Local Plans must be assessed as to whether they accord with legal and procedural requirements and meet the tests of soundness as set out below:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."

Supplementary Questions

The proceeding section will address the supplementary questions produced by the Inspector.

Matter 2: Visions, Objectives and Sustainable Development and the Development Strategy

Issue 3 – The Development Strategy

Supplementary Question 1: Does the development strategy set out in Policy DS1 represent a robust and appropriate approach for the distribution of housing, employment and other development in the longer term, having regard to the Inspectors' initial findings (Exam 55) in relation to Charnwood's apportionment of Leicester's unmet need for housing and employment land?

We consider that the development strategy set out in Policy DS1 does not represent a robust and appropriate approach for the distribution of housing, employment and other development in the longer term, as it fails to address the unmet need arisen from Leicester City. The Inspectors' initial findings (Exam 55) indicate that a figure of 18,700 dwellings represents a reasonable working assumption for the scale of Leicester's unmet housing need from 2020-2036.

The Inspectors have concluded that the **minimum** (our emphasis) local housing need for Charnwood is 1,189 dwellings per annum (dpa) and that this figure will be further tested during the resumed hearing sessions. The fact that the Leicester Urban Area (Birstall, Syston and Thurcaston) is identified in the Draft Plan to accommodate the largest proportion of the new dwellings total (38%) is considered important. Additional sites will now need to be identified within this locality in order to accommodate the higher housing requirement figure resulting from the requirement to meet a significant proportion of Leicester's unmet housing need, as well as at least an additional year's housing requirement in order to ensure that the Plan can have a lifespan of at least 15 years after it is adopted.

However, the Leicester Urban Area needs to be expanded as it is of paramount importance that as large a proportion as possible of the unmet need is delivered in those areas which relate most closely to Leicester City. Thurgate is identified as an 'other settlement'. However, it is physically very well connected to Leicester City via Leicester Road leading to Ashton Green Road. The settlement is connected to the city centre by the 145 bus running approximately once an hour between 8am and 7pm on weekdays and 7am and 7pm on Saturdays. Therefore, it would be an appropriate location for sustainable growth and a suitable location to include within the Leicester Urban Area. Directing development towards the edge of Leicester and extending the Leicester Urban Area will contribute to achieving all three sustainability objectives in accordance with paragraph 8 of the NPPF (2021) and would meet the test of soundness by being justified, effective and consistent with national policy.

We have an interest in Land East of Thurgate (SHELAA reference: PSH120). The site extends approximately 38.8 hectares and is being promoted to deliver 585 dwellings in a highly sustainable location. The site presents an opportunity to contribute to meeting Leicester's unmet need in accordance with the above strategy.

I trust the above representation will be given due consideration during the examination.